FY17 to FY18 Mid-Year Analysis for Regional Evaluation 6/19/18

PURPOSE

This document provides an in-depth analysis of the changes in enforcement outputs (initiations, conclusions and inspections) between mid-year FY 17 and mid-year FY 18 by programs and region. The detailed tables and charts supporting this short summary follow. Per the June 19, 2018 email from OECA's Deputy Assistant Administrator, we have asked the regions to respond to three requests: 1) verify data accuracy, 2) provide a narrative explanation for output changes of greater than or less than 10%, and 3) provide projections for your FY2018 end of year activities (see email for details).

CAVEAT

Regions are expected to enter data into ICIS within 10 business days of the event. The FY17 mid-year data should be of <u>very high quality</u> as the regions had 7 months after March 31, 2017 to complete and certify their data. The FY18 -mid-year data should be of good quality as the regions have had two months to complete data entry after mid-year close (March 31, 2018), but the end of year data certification process that prompts data quality reviews does not occur until October 2018.

INITIATIONS

- Between MY FY 17 and MY FY 18, there was a 24% decline in the number of initiations among all programs
- Between MY FY 17 and MY FY 18, every enforcement program had a decline in the number of initiations except SDWA PWS (65% increase).¹
- The major enforcement programs saw declines as follows:
 - CAA Stationary Source = -52%
 - CWA NPDES = -36%
 - RCRA HW = -17%
- From MY FY 17 to MY FY 18, every region had a decline in the number of initiations
 - Regions 2, 6 and 9 had declines of less than 10%
 - o Regions 3 (40%), 4 (49%), and 8 (53%) had declines of at least 40%
- Overall there was a 28% decline in the number of civil judicial referrals from MY FY 17 to FY 18

CONCLUSIONS

- From MY FY 17 and MY FY 18, there was a 23% decline in conclusions among all programs which we expect would lead to a decline in outcomes, such as penalty dollars, injunctive relief and environmental benefits (assuming there is no surprise huge case).
- From MY FY 17 and MY FY 18, every enforcement program had a decline in conclusions except SDWA PWS (50% increase)
 - The SDWA PWS increase is not consistent among all regions
- The major enforcement programs saw declines as follows:

¹ There was a slight increase in PWS inspections from FY2016 to FY2017, which may partially explain the increase in enforcement actions in MY FY2108.

- CAA Stationary Source = -38%
- CWA NPDES = -38%
- O RCRA HW = -23%
- Between MY FY 17 to MY FY 18, Regions 2 and 9 remained stable in the number of conclusions, while every other region had a decline of at least 14%
 - o Regions 1 (42%), 3 (38%), and 4 (48%) had declines of at least 38%
- Overall there was a 21% decline in the number of civil judicial conclusions from FY 17 to FY 18

INSPECTIONS

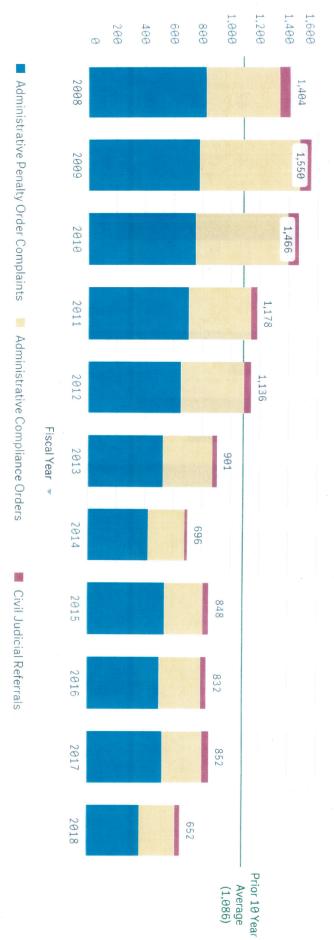
- Between MY FY 17 and MY FY 18, there was a 33% decline in the number of inspections among all programs (MY FY 17 = 3,747: MY FY 18 = 2,508)
- From MY FY 17 to MY FY 18, every region had a decline of at least 15% in the number of inspections
- Between MY FY 17 and MY FY 18, CAA Stationary Source Partial Compliance Evaluations (PCEs) had the largest drop in number of inspections (-469, or -68% decline)

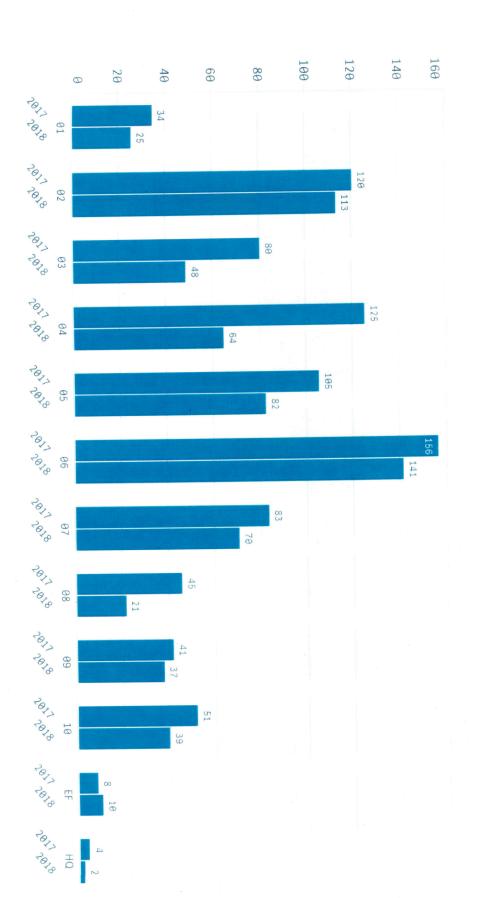
ATTACHMENTS

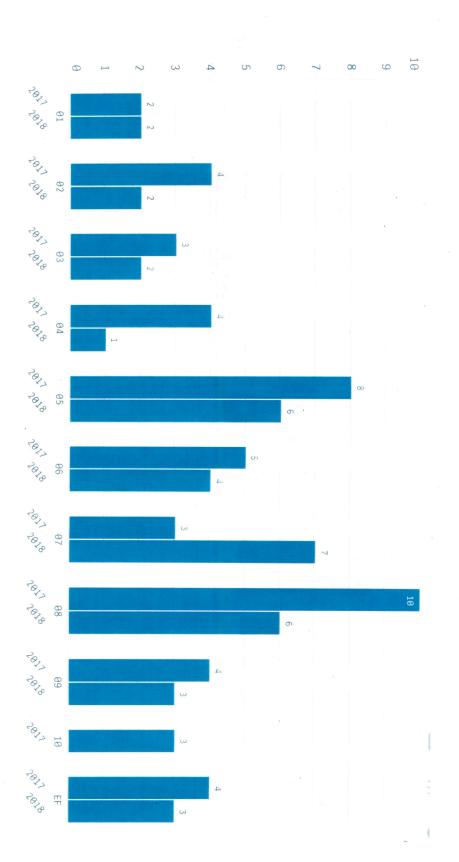
- Charts: 1. Total Initiations by year: Mid-Year to Mid-Year Comparison
 - 2. Total Initiations by Region: Mid-Year to Mid-Year Comparison
 - 3. Civil Judicial referrals by Region: Mid-Year to Mid-Year Comparison
 - 4. Total Conclusions by Year: Mid-Year to Mid-Year Comparison
 - 5. Total Conclusions by Region: Mid-Year to Mid-Year Comparison
 - 6. Civil Judicial Conclusions by Region: Mid-Year to Mid-Year Comparison
 - 7. Inspections by Year: Mid-Year to Mid-Year Comparison
 - 8. Inspections by Region: Mid-Year to Mid-Year Comparison
- Tables: 1. National Initiations
 - 2. National Conclusions
 - 3. Conclusions by Region
 - 4. National Inspections
 - 5. Inspections by Region

Total Initiations by Year: Mid-Year to Mid-Year Comparison

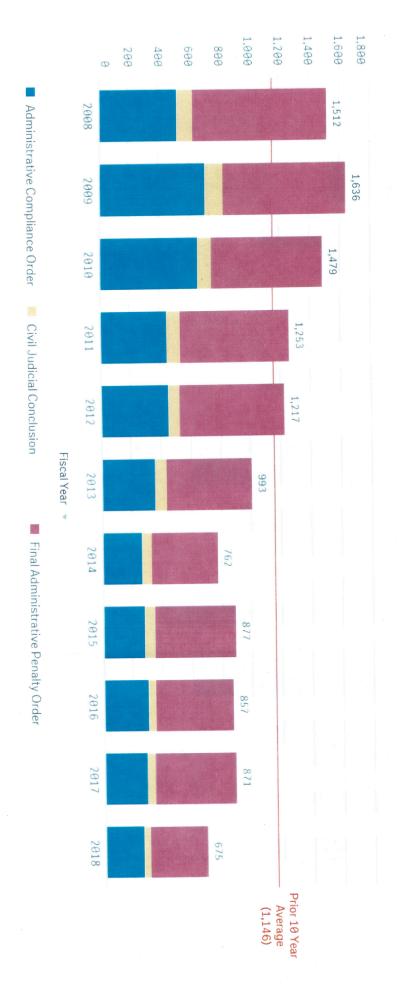
Number of Initiations

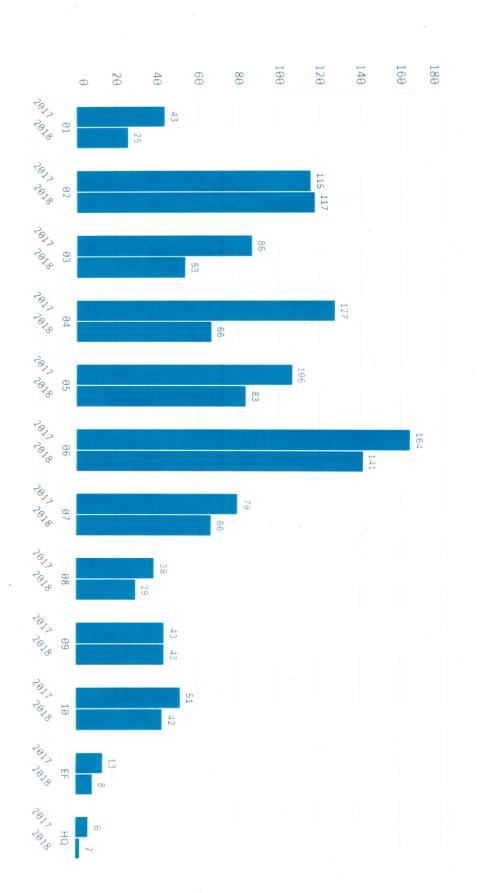


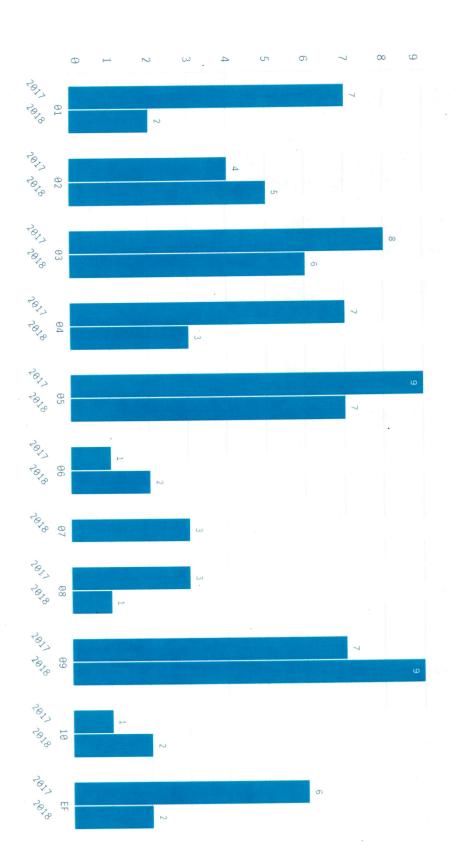




Total Conclusions by Year: Mid-Year to Mid-Year Comparison

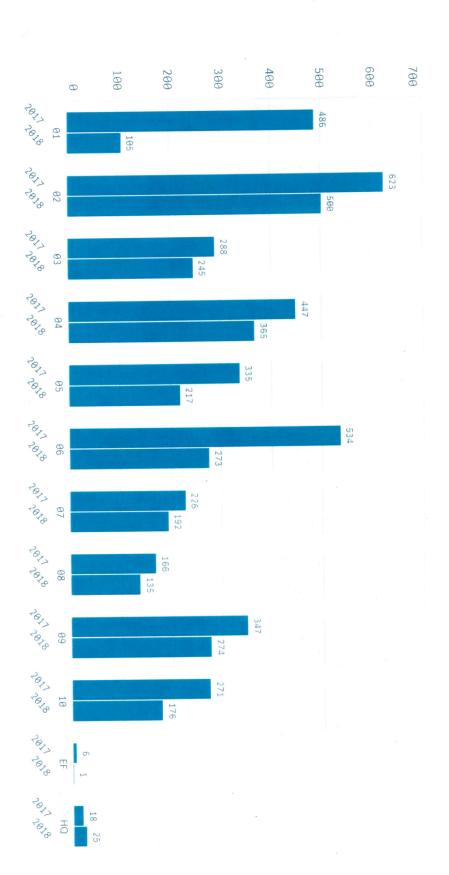






Inspections by Year: Mid-Year to Mid-Year Comparison





Total Enforcement Initiations Change (Judicial & Administrative) Mid-Year FY 17 to Mid-Yer FY 18 National Results by Program

| | | | Change | Percent Change |
|-----------------------|------|------|------------|----------------|
| Programs | 2017 | 2018 | MY FY17 to | MY FY17 to |
| | | | MY FY 18 | MY FY18 |
| CERCLA | 66 | 61 | -5 | -7.58% |
| CWA 404 | 23 | 19 | -4 | -17.39% |
| CAA Stationary Source | 69 | 33 | -36 | -52.17% |
| CWA NPDES | 179 | 115 | -64 | -35.75% |
| RCRA HW | 53 | 44 | -9 | -16.98% |
| CWA 311 | 57 | 43 | -14 | -24.56% |
| EPCRA 313 | 20 | 13 | -7 | -35.00% |
| FIFRA | 76 | 47 | -29 | -38.16% |
| TSCA | 53 | 38 | -15 | -28.30% |
| CAA 112r | 80 | 56 | -24 | -30.00% |
| SDWA PWS | 49 | 81 | 32 | 65.31% |
| EPCRA non 313 | 30 | 22 | -8 | -26.67% |
| RCRA UST | 63 | 54 | -9 | -14.29% |
| RCRA CA | 3 | 0 | -3 | -100.00% |
| CAA Mobile Source | 20 | 18 | -2 | -10.00% |
| SDWA UIC | 10 | 8 | -2 | -20.00% |
| APPS Mobile Source | 1 | 0 | -1 | -100.00% |
| Totals | 852 | 652 | -200 | -23.47% |

| Administrative Enforcement Initiations Change | |
|---|---|
| Mid-Year FY 17 to Mid-Yer FY 18 National Results by Program | m |

| Change Percent Change | | | | | |
|-----------------------|------|------|------------|------------|--|
| Programs | 2017 | 2018 | MY FY17 to | MY FY17 to | |
| | 2017 | 2010 | MY FY 18 | MY FY18 | |
| CERCLA | 47 | 48 | 1 | 2.13% | |
| CWA 404 | 22 | 16 | -6 | -27.27% | |
| CAA Stationary Source | 57 | 27 | -30 | -52.63% | |
| CWA NPDES | 174 | 113 | -61 | -35.06% | |
| RCRA HW | 52 | 41 | -11 | -21.15% | |
| CWA 311 | 55 | 42 | -13 | -23.64% | |
| EPCRA 313 | 20 | 13 | -7 | -35.00% | |
| FIFRA | 76 | 47 | -29 | -38.16% | |
| TSCA | 53 | 37 | -16 | -30.19% | |
| CAA 112r | 76 | 55 | -21 | -27.63% | |
| SDWA PWS | 48 | 81 | 33 | 68.75% | |
| EPCRA non 313 | 30 | 22 | -8 | -26.67% | |
| RCRA UST | 63 | 54 | -9 | -14.29% | |
| RCRA CA | 2 | 0 | -2 | -100.00% | |
| CAA Mobile Source | 16 | 15 | -1 | -6.25% | |
| SDWA UIC | 10 | 5 | -5 | -50.00% | |
| APPS Mobile Source | 1 | 0 | -1 | -100.00% | |
| Totals | 802 | 616 | -186 | -23.19% | |

Civil Judicial Referrals Change Mid-Year FY 17 to Mid-Yer FY 18 National Results by Program

| Mid-Year FY 17 to Mid-Yer FY 18 National Results by Program | | | | | |
|---|------|------|------------|----------------|--|
| | | | Change | Percent Change | |
| Programs | 2017 | 2018 | MY FY17 to | MY FY17 to | |
| | | | MY FY 18 | MY FY18 | |
| CERCLA | 19 | 13 | -6 | -31.58% | |
| CWA 404 | 1 | 3 | . 2 | 200.00% | |
| CAA Stationary Source | 12 | 6 | -6 | -50.00% | |
| CWA NPDES | 5 | 2 | -3 | -60.00% | |
| RCRA HW | 1 | 3 | 2 | 200.00% | |
| CWA 311 | 2 | 1 | -1 | -50.00% | |
| EPCRA 313 | 0 | 0 | 0 | - | |
| FIFRA | 0 | 0 | 0 | - | |
| TSCA | 0 | 1 | 1 | 100.00% | |
| CAA 112r | 4 | 1 | -3 | 100.00% | |
| SDWA PWS | 1 | 0 | -1 | -100.00% | |
| EPCRA non 313 | 0 | 0 | 0 | - | |
| RCRA UST | 0 | 0 | 0 | - | |
| RCRA CA | 1 | 0 | -1 | -100.00% | |
| CAA Mobile Source | 4 | 3 | -1 | -25.00% | |
| SDWA UIC | 0 | 3 | 3 | 100.00% | |
| APPS Mobile Source | 0 | 0 | 0 | - | |
| Totals | 50 | 36 | -14 | -28.00% | |

Total Enforcement Initiations Change (Judicial & Administrative) Mid-Year FY 17 to Mid-Yer FY 18 by Region

| | | | Change | Percent Change MY |
|-----------|------|------|------------|-------------------|
| Region | 2017 | 2018 | MY FY17 to | FY17 to |
| | | | MY FY 18 | MY FY18 |
| Region 1 | 34 | 25 | -9 | -26.47% |
| Region 2 | 120 | 113 | -7 | -5.83% |
| Region 3 | 80 | 48 | -32 | -40.00% |
| Region 4 | 125 | 64 | -61 | -48.80% |
| Region 5 | 105 | 82 | -23 | -21.90% |
| Region 6 | 156 | 141 | -15 | -9.62% |
| Region 7 | 83 | 70 | -13 | -15.66% |
| Region 8 | 45 | 21 | -24 | -53.33% |
| Region 9 | 41 | 37 | -4 | -9.76% |
| Region 10 | 51 | 39 | -12 | -23.53% |
| HQ | 12 | 12 | 0 | 0.00% |
| Totals | 852 | 652 | -200 | -23.47% |

Administrative Enforcement Initiations Change Mid-Year FY 17 to Mid-Yer FY 18 by Region

| Mid-Year FY 17 to Mid-Yer FY 18 by Region | | | | | | |
|---|------|------|------------|-------------------|--|--|
| | | | | Percent Change MY | | |
| Region | 2017 | 2018 | MY FY17 to | FY17 to | | |
| | | | MY FY 18 | MY FY18 | | |
| Region 1 | 32 | 23 | -9 | -28.13% | | |
| Region 2 | 116 | 111 | -5 | -4.31% | | |
| Region 3 | 77 | 46 | -31 | -40.26% | | |
| Region 4 | 121 | . 63 | -58 | -47.93% | | |
| Region 5 | 97 | 76 | -21 | -21.65% | | |
| Region 6 | 151 | 137 | -14 | -9.27% | | |
| Region 7 | 80 | 63 | -17 | -21.25% | | |
| Region 8 | 35 | 15 | -20 | -57.14% | | |
| Region 9 | 37 | 34 | -3 | -8.11% | | |
| Region 10 | 48 | 39 | -9 | -18.75% | | |
| HQ | 8 | 9 | 1 | 12.50% | | |
| Totals | 802 | 616 | -186 | -23.19% | | |

Civil Judicial Referrals Change Mid-Year FY 17 to Mid-Yer FY 18 by Region

| Region | 2017 | 2018 | Change MY FY17 to | Percent Change MY FY17 to | | |
|-----------|------|------|----------------------|------------------------------|--|--|
| | | | MY FY 18 | MY FY18 | | |
| Region 1 | 2 | . 2 | 0 | 0.00% | | |
| Region 2 | 4 | 2 | -2 | -50.00% | | |
| Region 3 | 3 | 2 | -1 | -33.33% | | |
| Region 4 | 4 | 1 | -3 | -75.00% | | |
| Region 5 | 8 | 6 | -2 | -25.00% | | |
| Region 6 | 5 | 4 | -1 | -20.00% | | |
| Region 7 | 3 | 7 | 4 | 133.33% | | |
| Region 8 | 10 | 6 | -4 | -40.00% | | |
| Region 9 | 4 | 3 | -1 | -25.00% | | |
| Region 10 | 3 | 0 | -3 | -100.00% | | |
| HQ | 4 | 3 | -1 | -25.00% | | |
| Totals | 50 | 36 | -14 | -28.00% | | |

| Total Enforcement Concl usions Change (Judi cial & Administrative) | 2 |
|--|---|
| Mid-Year FY 17 to Mid-Yer FY 18 National Results by Program | |

| Change Percent Change | | | | | | |
|-----------------------|------|------|------------|------------|--|--|
| Programs | 2017 | 2018 | MY FY17 to | MY FY17 to | | |
| riogianis | 2027 | | MY FY 18 | MY FY18 | | |
| CERCLA | 67 | 66 | -1 | -1.49% | | |
| CWA 404 | 26 | 15 | -11 | -42.31% | | |
| CAA Stationary Source | 64 | 40 | -24 | -37.50% | | |
| CWA NPDES | 189 | 118 | -71 | -37.57% | | |
| RCRA HW | 57 | 44 | -13 | -22.81% | | |
| CWA 311 | 55 | 43 | -12 | -21.82% | | |
| EPCRA 313 | 22 | 13 | -9 | -40.91% | | |
| FIFRA | 77 | 54 | -23 | -29.87% | | |
| TSCA | 53 | 43 | -10 | -18.87% | | |
| CAA 112r | 76 | 55 | -21 | -27.63% | | |
| SDWA PWS | 54 | 81 | 27 | 50.00% | | |
| EPCRA non 313 | 30 | 23 | -7 | -23.33% | | |
| RCRA UST | 65 | 57 | -8 | -12.31% | | |
| RCRA CA | 2 | 0 | -2 | -100.00% | | |
| CAA Mobile Source | 25 | 16 | -9 | -36.00% | | |
| SDWA UIC | 8 | 7 | -1 | -12.50% | | |
| APPS Mobile Source | 1 | 0 | -1 | -100.00% | | |
| Totals | 871 | 675 | -196 | -22.50% | | |

| Administrative Enforcement Concl usions Change |
|---|
| Mid-Year FY 17 to Mid-Yer FY 18 National Results by Program |

| Mid-Year FY 17 to Mid-Yer FY 18 National Results by Program | | | | | |
|---|------|------|----------------------------------|---|--|
| Programs | 2017 | 2018 | Change MY FY17 to MY FY 18 | Percent Change MY FY17 to MY FY18 | |
| CERCLA | 47 | 48 | 1 | 2.13% | |
| CWA 404 | 22 | 14 | -8 | -36.36% | |
| CAA Stationary Source | 55 | 28 | -27 | -49.09% | |
| CWA NPDES | 180 | 114 | -66 | -36.67% | |
| RCRA HW | 55 | 42 | -13 | -23.64% | |
| CWA 311 | 54 | 43 | -11 | -20.37% | |
| EPCRA 313 | 22 | 13 | -9 | -40.91% | |
| FIFRA | 77 | 54 | -23 | -29.87% | |
| TSCA | 52 | 43 | -9 | -17.31% | |
| CAA 112r | 76 | 54 | -22 | -28.95% | |
| SDWA PWS | 54 | 81 | 27 | 50.00% | |
| EPCRA non 313 | 30 | 23 | -7 | -23.33% | |
| RCRA UST | 64 | 55 | -9 | -14.06% | |
| RCRA CA | 2 | 0 | -2 | -100.00% | |
| CAA Mobile Source | 19 | 14 | -5 | -26.32% | |
| SDWA UIC | 8 | 7 | -1 | -12.50% | |
| APPS Mobile Source | 1 | 0 | -1 | -100.00% | |
| Totals | 818 | 633 | -185 | -22.62% | |

Judicial Enforcement Concl usions Change Mid-Year FY 17 to Mid-Yer FY 18 National Results by Program

| Mid-Year FY 17 to Mid-Yer FY 18 National Results by Program | | | | | | |
|---|------|------|----------------------------------|---|--|--|
| Programs | 2017 | 2018 | Change MY FY17 to MY FY 18 | Percent Change MY FY17 to MY FY18 | | |
| CERCLA | 20 | 18 | -2 | -10.00% | | |
| CWA 404 | 4 | 1 | -3 | -75.00% | | |
| CAA Stationary Source | 9 | 12 | 3 | 33.33% | | |
| CWA NPDES | 9 | 4 | -5 | -55.56% | | |
| RCRA HW | 2 | 2 | 0 | 0.00% | | |
| CWA 311 | 1 | 0 | -1 | -100.00% | | |
| EPCRA 313 | 0 | 0 | 0 | - | | |
| FIFRA | 0 | 0 | 0 | - | | |
| TSCA | 1 | 0 | -1 | -100.00% | | |
| CAA 112r | 0 | 1 | 1 | 100.00% | | |
| SDWA PWS | 0 | 0 | . 0 | - | | |
| EPCRA non 313 | 0 | 0 | 0 | - | | |
| RCRA UST | 1 | 2 | 1 | 100.00% | | |
| RCRA CA | 0 | 0 | 0 | - | | |
| CAA Mobile Source | 6 | 2 | -4 | -66.67% | | |
| SDWA UIC | 0 | 0 | 0 | - | | |
| APPS Mobile Source | 0 | 0 | 0 | - | | |
| Totals | 53 | 42 | -11 | -20.75% | | |

Total Enforcement Concl usions Change (Judi cial & Administrative) Mid-Year FY 17 to Mid-Yer FY 18 by Regi on

| | | | Change | Percent Change MY |
|-----------|------|------|------------|-------------------|
| Region | 2017 | 2018 | MY FY17 to | FY17 to |
| | | | MY FY 18 | MY FY18 |
| Region 1 | 43 | 25 | -18 | -41.86% |
| Region 2 | 115 | 117 | 2 | 1.74% |
| Region 3 | 86 | . 53 | -33 | -38.37% |
| Region 4 | 127 | 66 | -61 | -48.03% |
| Region 5 | 106 | 83 | -23 | -21.70% |
| Region 6 | 164 | 141 | -23 | -14.02% |
| Region 7 | 79 | 66 | -13 | -16.46% |
| Region 8 | 38 | 29 | -9 | -23.68% |
| Region 9 | 43 | 43 | 0 | 0.00% |
| Region 10 | 51 | 42 | -9 | -17.65% |
| HQ | 19 | 10 | -9 | -47.37% |
| Totals | 871 | 675 | -196 | -22.50% |

Administrative Enforcement Concl usions Change Mid-Year FY 17 to Mid-Yer FY 18 by Region

| | IVIIG I C | a, , , a, to | ina rent de aj | - |
|-----------|-----------|--------------|----------------|-------------------|
| | | | Change | Percent Change MY |
| Region | 2017 | 2018 | MY FY17 to | FY17 to |
| | | | MY FY 18 | MY FY18 |
| Region 1 | 36 | 23 | -13 | -36.11% |
| Region 2 | 111 | 112 | 1 | 0.90% |
| Region 3 | 78 | 47 | -31 | -39.74% |
| Region 4 | 120 | 63 | -57 | -47.50% |
| Region 5 | 97 | 76 | -21 | -21.65% |
| Region 6 | 163 | 139 | -24 | -14.72% |
| Region 7 | 79 | 63 | -16 | -20.25% |
| Region 8 | 35 | 28 | -7 | -20.00% |
| Region 9 | 36 | 34 | -2 | -5.56% |
| Region 10 | 50 | 40 | -10 | -20.00% |
| HQ | 13 | . 8 | -5 | -38.46% |
| Totals | 818 | 633 | -185 | -22.62% |

Judicial Enforcement Concl usions Change Mid-Year FY 17 to Mid-Yer FY 18 by Region

| | | | Change | Percent Change MY |
|-----------|------|------|------------|-------------------|
| Region | 2017 | 2018 | MY FY17 to | FY17 to |
| | | | MY FY 18 | MY FY18 |
| Region 1 | 7 | 2 | -5 | -71.43% |
| Region 2 | 4 | 5 | 1 | 25.00% |
| Region 3 | 8 | 6 | -2 | -25.00% |
| Region 4 | 7 | 3 | -4 | -57.14% |
| Region 5 | 9 | 7 | -2 | -22.22% |
| Region 6 | 1 | 2 | 1 | 100.00% |
| Region 7 | 0 | 3 | 3 | 100.00% |
| Region 8 | 3 | 1 | -2 | -66.67% |
| Region 9 | 7 | 9 | 2 | 28.57% |
| Region 10 | 1 | 2 | 1 | 100.00% |
| HQ | 6 | 2 | -4 | -66.67% |
| Totals | 53 | 42 | -11 | -20.75% |

| 2017 2018 W PRIJO MN PES 2018 W PRIJO MN PES | | | Reg | ion 1 | | Regio | | Mid-Year FY 17 to Mid-Yer FY 18 by Program | Yer FY 18 b | y Program | | | | | | |
|--|-----------------------|--------|------|--------------------|------|----------|--------------------|--|-------------|----------------|------|------|--------------------|------|------|--------------------|
| Math 2017 2018 Math 10 10 10 10 10 10 10 1 | | | Reg | Region 1 | | Region 2 | on 2 | | R | gion 3 | | Re | Region 4 | | Reg | Region 5 |
| Section 3 | Programs | 2017 | 2018 | MY FY17 to MY FY18 | 2017 | | MY FY17 to MY FY18 | 2017 | 2018 | Percent Change | 2017 | 2018 | Percent Change | 2017 | 2018 | Percent Change |
| Source 3 1 | CERCLA | 2 | 4 | 100.00% | 9 | 13 | 44.44% | | Ð | -55.56% | 11 | | 46.15% | 13 | 12 | |
| | CWA 404 | w | 1 | -66.67% | 2 | 0 | -100.00% | (5) | 01 | 40.00% | | | 400.00% | 2 | | |
| 10 6 40,0006 26 43,888 19 7 30,000 19 10 10 10 10 10 10 | CAA Stationary Source | ω | 5 | 66.67% | 1 | 1 | 0.00% | 5 | Ů. | 0.00% | 15 | | -53.33% | 29 | 10 | |
| | CWA NPDES | 10 | 6 | -40.00% | 46 | 26 | -43.48% | 10 | | 7 -30.00% | 15 | | -94 74% | | | Ť |
| 2 2 2 2 2 2 2 2 2 2 | RCRA HW | w | 0 | -100.00% | 2 | 2 | 0.00% | 7 | | | | | -40.00% | 7 | 7 | |
| | CWA 311 | 2 | 2 | 0.00% | 4 | 0 | -100.00% | 5 | | | | | 200.00% | 2 | | |
| | EPCRA 313 | 2 | 1 | -50.00% | 0 | 0 | | 3 | | | | 5 | | 2 | | |
| | FIFRA | . 5 | . 0 | -100.00% | 2 | 0 | -100.00% | 17 | | | 12 | | -75.00% | 13 | | 53.85% |
| | TSCA | 4 | 4 | 0.00% | 6 | 4 | -33.33% | 4 | | | 11 | | | 3 2 | | |
| 1 | CAA 112r | 4 | 1 | -75.00% | 0 | 0 | | 11 | | | 20 | 1 | | 6 | | |
| | SDWA PWS | 0 | 0 | | 11 | 44 | 300.00% | 1 | | | | | | 5 0 | | |
| | EPCRA non 313 | 1 | 0 | -100.00% | 0 | 0 | 1 | 6 | | | 12 | | | 9 | | |
| Color Colo | RCRA UST | 4 | 1 | -75.00% | 31 | 27 | -12.90% | 2 | | | 7 | 8 | 14.29% | 6 | 5 | |
| | RCRA CA | 0 | 0 | | 0 | 0 | | 0 | | | | - | | 2 | 0 0 | |
| Trouble | CAA Mobile Source | 0 | 0 | | 1 | 0 | -100.00% | 1 | | | | | | 0 | | |
| Trouble 10 0 0 0 0 0 0 0 0 | SDWA UIC | 0 | 0 | , | 0 | 0 | | 0 | | | | | | | | |
| Totall | APPS Mobile Source | 0 | 0 | | 0 | 0 | | | | | | | -100.001- | | 0 | |
| Region R | Totals | 43 | 25 | -41.86% | 115 | 117 | 1.74% | 86 | (5) | | 127 | 66 | -48.03% | 106 | | |
| Mathematic Mat | | Region | 6 | | | Regio | | | | | | | | | | 5 |
| | Programs | 2017 | 2018 | Percent Change | 2017 | | Percent Change | 2017 | 2018 | Percent Change | 2017 | 1.5 | Percent Change | | neg: | Percent Change |
| 3 | CERCLA | 2 | 2 | 0.00% | ω | 5 | 66.67% | Δ | | M of / LA4 AW | | | MY FY17 to MY FY18 | T | | MY FY17 to MY FY18 |
| Source 4 2 | CWA 404 | 3 | 1 | -66.67% | ω | 2 | -33.33% | ω . | | | 201 | 12 | 100.00% | | 2 2 | |
| Se 39 | CAA Stationary Source | 4 | 2 | -50.00% | 0 | 1 | 100.00% | 2 | | | 5 1 | | %00.00± | | 7 1 | -33.33% |
| 19 | CWA NPDES | 58 | 39 | -32.76% | 14 | 15 | 7.14% | ∞ | ω. | -62.50% | 6 | 5 | | 12 | 4 | |
| 20 | RCRA HW | 23 | 19 | -17.39% | 4 | 6 | 50.00% | 1 | 0 | -100.00% | 0 | | | 5 | | |
| 3 3 30.00% 11 4 638.64% 3 3 30.00% 12 10 10 10 10 10 10 10 | CWA 311 | 20 | 17 | -15.00% | 21 | 7 | -66.67% | . 2 | w | 50.00% | 1 | 5 | | 1 | 0 | -100.00% |
| 12 10 10 10 10 10 10 10 | FIFRA | u t | u o | 200.00% | 11 | ۵ د | 50 040 | 0 | | | 0 | 0 | | 0 | 1 | |
| 23 17 26.09% 9 12 33.33% 0 0 2.50.0% 2.60.0% 2.60.0% 0 0 0 0 0 0 0 0 0 | TSCA | 0 | 0 | | 12 | 10 | -16 67% | | 4 0 | 33.33% | 2 | | | 5 | 4 | |
| 24 | CAA 112r | 23 | 17 | -26.09% | 9 | 12 | % te te | 0 1 | | -25.00% | 4 | | | 4 | 4 | 0.00% |
| 1 | SDWA PWS | 24 | 29 | 20.83% | 1 | 0 | -100.00% | 10 | 7 | 76UU UE- | 2 - | 0 | -100.00% | 2 | 5 | |
| 1 3 200,00% 0 1 100,00% 1 1 1 1 1 1 1 1 1 | EPCRA non 313 | 0 | 0 | | 0 | 1 | 100.00% | 0 | 1 | 100.00% | 0 | | | 0 | 4 0 | 100 00% |
| C.C. O O O O O O O O O | RCRA UST | 0 | 0 | , | 1 | ω | 200.00% | 0 | 1 | 100.00% | 0 | 0 | | 14 | ۹ ۵ | |
| Obbile Source O O O O O O O O O | RCRA CA | 0 | 0 | | 0 | 0 | | 0 | 0 | | 0 0 | | | 2 1 | 0 | -55./1% |
| Dic Dic | CAA Mobile Source | 0 | 0 | 1 | 0 | 0 | - | 0 | 0 | | 11 | | -54.55% | 0 0 | 4 | |
| Mobile Source | SDWA UIC | 0 | 6 | 100.00% | 0 | 0 | | 1 | 0 | | 0 | | | _ | D | 100.00% |
| Totals 164 141 -14.02% 79 66 -16.46% 38 29 -23.68% | APPS Mobile Source | 0 | 0 | | 0 | 0 | | 0 | 0 | | | | | | | W.00.00T- |
| HQ Programs 2017 2018 MY FY17 to MY FY18 A | 1 | 164 | 141 | -14.02% | 79 | 66 | -16.46% | 38 | 29 | -23.68% | 43 | 43 | 0.00% | 51 | 42 | -17 65% |
| Programs 2017 2018 Percent Change MY FY17 to MY FY18 A 0 0 0 1004 0 0 0 104 0 0 0 104 0 0 0 121 0 0 0 1313 0 0 0 127 0 0 0 128 0 0 0 129 0 0 0 NNDS 0 0 0 127 0 0 0 NDMS 0 0 0 UST 0 0 0 CA 0 0 -33.33% Albille Source 12 8 -33.33% UBC 0 -100.00% | | HO. | | | | | | | | | | | | | 4. | |
| MY FY17 to MY FY18 | Programs | 2017 | 2018 | Percent Change | | | | | | | | | | | | |
| A 0 0 0 1 101 101 101 101 101 101 101 10 | | /107/ | 8107 | MY FY17 to MY FY18 | | | | | | | | | | | | |
| 1004 0 0 | CERCLA | 0 | 0 | | | | | | | | | | | | | |
| Itationary Source 0 0 HWDES 0 0 HW 0 0 311 0 0 313 0 0 2 2 0.00% 12r 0 0 PWS 0 0 Anon 313 0 0 CA 0 CA 0 CA 0 CA 0 CA 0 <td>CWA 404</td> <td>0</td> <td>0</td> <td></td> | CWA 404 | 0 | 0 | | | | | | | | | | | | | |
| HWDES 0 0 0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | CAA Stationary Source | 0 | 0 | | | | | | | | | | | | | |
| N313 0 0 0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | CWA NPDES | 0 | 0 | | | | | | | | | | | | | |
| X313 0 0 0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | CMV 311 | | 0 0 | | | | | | | | | | | | | |
| 1313 0 0 0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | CANYOTT | | | | | | | | | | | | | | | |
| 12r 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 | EPCRA 313 | . 0 | 0 | 100000 | | | | | | | | | | | | |
| 2 2 2 3 3 3 3 0 0 0 0 0 0 0 0 0 0 0 0 0 | TECA | 4 0 | , | %00.001- | | | | | | | | | | | | |
| 9313 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 | ISCA | 2 | 2 | 0.00% | | | | | | | | | | | | |
| 313 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 | CAA 112r | 0 | 0 | | | | | | | | | | | | | |
| 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 | SDWA PWS | 0 | 0 | | | | | | | | | | | | | |
| 0 0 0 0 0 0 0 0 0 0 | EPCRA non 313 | 0 | 0 | | | | | | | | | | | | | |
| 0 0 0 0 0 0 0 0 0 0 0 | RCRA UST | 0 | 0 | | | | | | | | | | | | | |
| 12 8 | RCRA CA | 0 | 0 | | | | | | | | | | | | | |
| 0 0 | CAA Mobile Source | 12 | 00 | -33.33% | | | | | | | | | | | | |
| 0 | SDWA UIC | 0 | 0 | | | | | | | | | | | | | |
| | APPS Mobile Source | 1 | 0 | -100.00% | | | | | | | | | | | | |

| -33.07% | -1239 | 2508 | 3747 | Totals |
|----------------------|----------------------|-----------------|----------------|---|
| -32.00% | -8 | 17 | 25 | TSCA PCBs |
| -18.64% | -63 | . 275 | 338 | TSCA Lead |
| -27.59% | -8 | 21 | 29 | TSCA Core |
| 25.00% | 2 | 10 | 8 | TSCA AHERA |
| -35.61% | -120 | 217 | 337 | SDWA UIC Inspection |
| -75.36% | 52 | 17 | 69 | SDWA PWSS Inspection |
| -28.19% | -64 | 163 | 227 | RCRA UST |
| -2.72% | -10 | 358 | 368 | RCRA HW |
| -4.76% | -1 | 20 | 21 | Pretreatment POTWs |
| -30.55% | -128 | 291 | 419 | NPDES Minors |
| 0.00% | 0 | 112 | 112 | NPDES Majors |
| 3.70% | 1 | 28 | 27 | FIFRA Good Laboratory Practices |
| 10.13% | 8 | 87 | 79 | FIFRA (non GLP) |
| -34.23% | -38 | 73 | 111 | EPCRA non 313 |
| -20.00% | -12 | 48 | 60 | EPCRA 313 non Data Quality |
| -40.00% | -4 | 6 | 10 | EPCRA 313 Data Quality |
| -18.57% | -13 | 57 | 70 | CWA Section 404 Wetlands |
| 38.24% | 13 | 47 | 34 | CWA Pretreatment IUs |
| -66.67% | -2 | 1 | 3 | CWA 311 Spill |
| -48.13% | -116 | 125 | 241 | CWA 311 SPCC |
| -29.87% | -23 | 54 | 77 | CWA 311 FRP |
| -67.97% | -469 | 221 | 690 | CAA Stationary Source PCEs |
| 14.81% | 8 | 62 | 54 | CAA Stationary Source FCEs |
| -27.74% | -38 | 99 | 137 | CAA Mobile Sources |
| -80.00% | -16 | 4 | 20 | CAA Asbestos Demolition and Renovation |
| -41.44% | -75 | 106 | 181 | CAA 112(r) |
| MY FY18 | MY FY 18 | - | | |
| Percent Change MY | Change MY FY17 to | 2018 | 2017 | Program |
| | gram | Results by Pro | -Y 18 National | Mid-Year FY 17 to Mid-Yer FY 18 National Results by Program |
| | | e (All Regions) | actions Chang | Total Compliance Inco |

| | | Total Comp Mid-Year FY 1 | Total Compliance Inspections Change Mid-Year FY 17 to Mid-Yer FY 18 by Region | ns Change 18 by Region | |
|----|-----------|-----------------------------|---|----------------------------------|--|
| | Region | 2017 | 2018 | Change MY FY17 to MY FY 18 | Percent Change MY FY17 to MY FY18 |
| 0 | Region 1 | 486 | 105 | -381 | -78.40% |
| % | Region 2 | 623 | 500 | -123 | -19.74% |
| 01 | Region 3 | 288 | 245 | -43 | -14.93% |
| 0 | Region 4 | 447 | 365 | -82 | -18.34% |
| 0 | Region 5 | 335 | 217 | -118 | -35.22% |
| 0 | Region 6 | 534 | 273 | -261 | -48.88% |
| 0 | Region 7 | 226 | 192 | -34 | -15.04% |
| 0 | Region 8 | 166 | 135 | -31 | -18.67% |
| 0 | Region 9 | 347 | 274 | -73 | -21.04% |
| 0 | Region 10 | 271 | 176 | -95 | -35.06% |
| 0 | на | 24 | 26 | 2 | 8.33% |
| 6 | Totals | 3747 | 2508 | -1239 | -33.07% |

| | | | | ő | | _ | | õ | _ | | 5 | * | _ | | | to | | | | õ | |
|--|-------|----|----------|----------|-----|-------|----------|----------|----|------|----------|-------------|----------|------|-----|---------|---------|-----|-----|----------|--------------------------------|
| | | | W1 14 1W | MY FY18 | | | MY FY 18 | 3 | _ | | MY FY 18 | L8 MY EV18 | 10 | | N. | 18 | 6 | | | MY FY 18 | õ |
| CAA IIZ(I) | 9 | 2 | -7 | -77.78% | 1 | 14 | -8 | -57.14% | | 28 | 30 | 2 7.14% | 4% | 17 | 0 | | 47000 | 3 | , | | OT 1 1 1 1 1 1 1 1 1 1 1 1 1 1 |
| CAA Asbestos Demolition and Renovation | 0 | 0 | 0 | | | 1 | 0 | -100 00% | | | | 7 | 3 3 | 1 | 9 | 6 | -47.06% | 13 | 9 | -4 | -30.//% |
| CAA Mobile Sources | 0 | 0 | 0 | _ | | 0 | 4 | 100 000 | T | | | 1. | 18 | 4 | 2 | -7 -7 | -77.78% | 0 | 0 | 0 | |
| CAA Stationary Source FCEs | 7 | 4 | | -47 86% | I | 10 18 | 0 | 200.00 | T | | Ī. | | 2% | 0 | 0 | 0 | | 0 | 4 | 4 | 100.00% |
| CAA Stationary Source PCEs | 348 | 77 | _321 | П | | | | T | I | | 20 | Т | 18 | 4 | ω | -1 -2 | 25.00% | 1 | 0 | -1 | -100.00% |
| CWA 311 FRP | 6 | | | T | | | | T | Ī | 77 | - | -5 -41.67% | 7% | 18 | 10 | -60 | -44.44% | 155 | 100 | -55 | -35.48% |
| CWA 311 SPCC | 21 | = | -10 | -47.62% | 3, | | 10 | T | T | 5 0 | Ī | | 3% | 19 | 18 | <u></u> | -5.26% | 0 | 0 | 0 | |
| CWA 311 Spill | 0 | 0 | 0 | | Ţ | | | 07.00/0 | Ī | 0 0 | Ī | -50.00% | 0% | 24 | 28 | 4 | 16.67% | 9 | 3 | -6 | -66.67% |
| CWA Pretreatment IUs | 4 | 4 | 0 | 0.00% | | 00 | 0 | 0,00% | T | u c | | Т | <u> </u> | 0 | - | 1 10 | 100.00% | 0 | 0 | 0 | |
| CWA Section 404 Wetlands | 3 | 3 | 0 | 0.00% | | 6 | -4 | | T | 21 0 | 7 0 | T, | 100 | | - | / 10 | 100.00% | 0 | 2 | 2 | 100.00% |
| EPCRA 313 Data Quality | 0 | 0 | 0 | | | 2 1 | -1 | -50 00% | Ī | | | 1 100,000 | 1 | = | 7 | -6 | -81.82% | u | 2 | -1 | -33.33% |
| EPCRA 313 non Data Quality | 4 | 5 | 1 | 25.00% | | 9 10 | | 11 11% | I | D | 7 0 | WOODT. T | 1 2 2 | 1 | 7 | Τ., | 00.00% | 0 | 0 | 0 | |
| EPCRA non 313 | 9 | 0 | -9 | -100.00% | 21 | | ا د- | | T | | 1 | T | | 17 | 15 | T. | 44.44% | 0 | 1 | 1 | 100.00% |
| FIFRA (non GLP) | 0 | 2 | 2 | 100.00% | | | | | Ţ | | | T | 1 | , 30 | 19 | -11 -3 | 36.67% | 16 | 7 | -9 | -56.25% |
| FIFRA Good Laboratory Practices | 0 | 0 | 0 | | | | | 7 | T | | | 9 100,000 | 8 8 | 0 | | T | 40.00% | 5 | 5 | 0 | 0.00% |
| NPDES Majors | 12 | 4 | -8 | -66.67% | 50 | | | 12.00% | | | | | | 1 0 | 0 | c | | 0 | 0 | 0 | - |
| NPDES Minors | 33 | 32 | ·- | -3.03% | 121 | | | . 1 | Ī | 7 1 | 17 | T | | : - | 5 | Τ. | 114.29% | 5 | 2 | ٺ | -60.00% |
| Pretreatment POTWs | 2 | 0 | -2 | -100.00% | 6 | | | 7 | T | | | 2 240.00% | | 41 | 22 | -19 -4 | 46.34% | 4 | 9 | 5 | 125.00% |
| RCRA HW | 7 | 0 | -7 | -100.00% | 73 | 3 90 | | T | Ī | 0 | | T | 18 | c | U | 5 10 | 100.00% | 1 | 0 | -1 | -100.00% |
| | 80 | 2 | -6 | -75.00% | 82 | | | . 1 | Ī | | 10 | 10 111 110/ | 8 8 | 115 | 108 | T | -6.09% | 37 | 28 | -9 | -24.32% |
| RCRA UST | 0 | 0 | 0 | | 8 | 8 4 | | | | | | | 1 | 0 0 | 9 4 | T. | -60.8/% | 24 | 36 | 77 | 50.00% |
| SDWA PWSS Inspection | 0 | 0 | 0 | | 70 | 30 | -40 | . | | 73 | | 5 -21 740/ | 8 8 | 0 | 0 | 0 |]. T | 0 | 0 | | |
| RCRA UST SDWA PWSS Inspection SDWA UIC Inspection | | 0 | 0 | | 0 | | | Т | I | | | T | 6 8 | 1 0 | 3 5 | | - | 35 | 0 | -35 | -100.00% |
| RCRA UST SDWA PWSS Inspection SDWA UIC Inspection TSCA AHERA | c | 0 | 0 | | 6 | 6 | -2 | -32 23% | | u (| 3 1 | 33 3300 | 1 | 1.0 | - | 2 4 | 40.00% | 0 | P | 1 | 100.00% |
| RCRA UST SDWA PWSS Inspection SDWA UIC Inspection TSCA AHERA TSCA Core | 0 0 | | , | -55.56% | 53 | 4 | -4 | _7 5502 | 37 | | 1 | -35.35% | 8 | - | 6 | 1 | -14.29% | 1 | 0 | -1 | -100.00% |
| RCRA UST SDWA PWSS Inspection DWA UIC Inspection TISCA AHERA TISCA Core TISCA Lead | 9 0 0 | 4 | ċ | | 10 | | | 00000 | I | 14 | - | TO:01% | 18 | , 9 | 61 | -18 -2 | 22.78% | 23 | 00 | -15 | -65.22% |
| RCRA UST SDWA PWSS inspection SDWA UIC Inspection TSCA AHERA TSCA Core TSCA Lead TSCA PCBs | 4 9 0 | 2 | -2 -5 | -50.00% | | 4 | | | | 2 | 2 | יירר רר | | , | 9 | 4 | 80.00% | ų | 0 | ώ | -100.00% |